

Nathan Ochsner, Clerk of Court

CRIMINAL NO. 4:21-cr-250

COUNT TWO
(Sex Trafficking of Minors and by Force, Fraud or Coercion)

From on or about August 1, 2019, through October 21, 2019, in the Southern District of Texas and elsewhere,

ARYION DUPREE JACKSON, aka “Ari” aka “Corleon”,

defendants herein, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as Minor Victim 2, who had attained the age of 14, but was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means Minor Victim 2, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 2 to engage in a commercial sex act, and that (2) Minor Victim 2, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex.

In violation of Title 18, United States Code, Section 1591(a), (b), (c) and 2.

COUNT THREE
(Coercion and Enticement)

From on or about January 1, 2020 and continuing through May 2, 2021, in the Southern District of Texas and elsewhere,

ARYION DUPREE JACKSON, aka “Ari” aka “Corleon”,

the defendant herein, knowingly persuaded, induced, and enticed an individual, that is, Adult Victim 1, to travel in interstate commerce, from the Southern District of Texas to the States of Florida and Georgia, to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2422(a) and Section 2.

COUNT FOUR
(Use of an Interstate Facility to Promote Sex Trafficking of a Minor)

From on or about January 1, 2020, through May 2, 2021, in the Southern District of Texas and elsewhere,

TASHEIKA JUANITA BUSH,

defendant herein, while aiding and abetting others, did willfully use a facility in interstate commerce, namely a cell phone, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, prostitution and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3) and (b) and Section 2.

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendant,

ARYION DUPREE JACKSON, aka “Ari” aka “Corleon”,

that in the event of conviction of the offenses charged in Counts One and Two of this Indictment, the following property is subject to forfeiture:

- (1) all real and personal property that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation and all property traceable to such property; and
- (2) all real and personal property constituting or derived from proceeds obtained, directly or indirectly, as a result of such violation and all property traceable to such property.

NOTICE OF FORFEITURE
(18 U.S.C. 2428(a))

Pursuant to Title 18, United States Code, Section 2428(a), the United States gives notice to defendant,

ARYION DUPREE JACKSON, aka “Ari” aka “Corleon”,

that in the event of conviction of the offense charged in Count Three of this Indictment, the following property is subject to forfeiture:

- (1) all real and personal property that was used or intended to be used to commit or to facilitate the commission of such violation, and
- (2) all real and personal property constituting or derived from proceeds

obtained, directly or indirectly, as a result of such violation.

Money Judgment and Substitute Assets

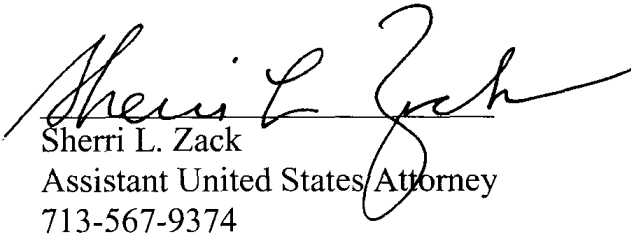
In the event that a condition listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant in substitution up to the total value of the property subject to forfeiture. The United States may seek the imposition of a money judgment.

A True Bill:

Original Signature on File
Grand Jury Foreperson

JENNIFER LOWERY
Acting United States Attorney

By:


Sherri L. Zack
Assistant United States Attorney
713-567-9374